



"Peter Butler"  
<pbutler@wildblue.net>  
11/06/2008 02:54 PM

To "Fearn Engineering" <fearneng@rmi.net>, "William Simon"  
<wsimon@frontier.net>, Sabrina  
Forrest/EPR/R8/USEPA/US@EPA

cc

bcc

Subject RE: Confidential: Viability of targeted listing in the Upper  
Animas Watershed

History: This message has been forwarded.

Well, my 2 cents worth is that ARSG's database is there for the public to use. If EPA wants to use it, they certainly can. In addition, if EPA wants to take samples around the basin, they obviously have the ability and right to do so.

I would be concerned that if EPA does their investigations without ARSG involvement, we don't have a say or a sense in what they are doing. If EPA really wants to pursue they're investigations, we want to be sure it is directed in an appropriate direction so that hopefully it can meet both some of our needs and theirs.

Peter Butler  
970-259-0986

-----Original Message-----

From: Fearn Engineering [mailto:fearneng@rmi.net]  
Sent: Thursday, November 06, 2008 2:16 PM  
To: William Simon; Forrest.Sabrina@epamail.epa.gov; pbutler@wildblue.net  
Subject: RE: Confidential: Viability of targeted listing in the Upper Animas Watershed

Sabrina - I understand the "Charge" you were given, but -- I totally agree with Bill Simon - for me - as a mine owner and as part of the continuing effort to find the best economic and environmental model for our area - I think bringing Superfund to the district negates 14 years of effort on my part (totally volunteer). I believe the best plan is largely a private effort. Our community has not found a non-mining economic model that works since the Sunnyside mine was shut down. The Tourism is fine, but we have never been able to develop the economic density required to keep the community truly viable (a opposed to just surviving) from alternative ventures.

By removing the threat of 'listing' it has been possible to talk to other entities about obtaining the funding necessary to start new mining operations (all of which are located on existing sites requiring remediation). Bill is right, just the process of re-looking at listing will put a hold on or will kill these negotiations.

As you know, I have real reservations about the Targeted Superfund program without some further protective legislation.

EPA has been a partner in the past, and has recognized this basin as a type of experiment to see if we could find a better way than the Superfund program.

Steve

-----Original Message-----

>From: William Simon <wsimon@frontier.net>  
>Sent: Nov 5, 2008 6:20 PM

>To: Forrest.Sabrina@epamail.epa.gov, pbutler@wildblue.net, fearneng@rmi.net  
>Subject: RE: Confidential: Viability of targeted listing in the Upper Animas Watershed

>

>Sabrina, I support your giving this matter another try although I don't  
>think the response will be too encouraging. Many, but not all, think  
>digging around, even for specific "listing" data could significantly  
>injure future mining possibilities. Bev Rich, upon returning from the  
>Butte conference, said "wow, you sure can tell Butte is a Superfund  
>town" stating our community is so much more involved with all aspects of  
>the projects, particularly setting the direction. Personally I think  
>EPA should be spending it's resources encouraging our independence and  
>bottom up management as an alternative to the superfund 'opportunity'.  
>EPA has done this in the past, started by Bill Yellowtail and supported  
>by Ms Russell and yourself, and we hope that continues.

>

>I would like to invite your manager to come up and hear our concerns  
>first hand. Bill

>

>-----Original Message-----

>From: Forrest.Sabrina@epamail.epa.gov  
>[mailto:Forrest.Sabrina@epamail.epa.gov]  
>Sent: Wednesday, November 05, 2008 12:33 PM  
>To: pbutler@wildblue.net; wsimon@frontier.net; fearneng@rmi.net  
>Subject: Confidential: Viability of targeted listing in the Upper Animas  
>Watershed

>

>

>Hi all, I am seeking input and support from you all on a task my  
>manager has given me that I won't be able to ignore. I have been  
>struggling a bit on how to put this out to you.

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>concurrently. Generally, if there are areas amenable to mining in an  
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>water quality and the downstream targets, AND the community wants them  
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>available source data, surface water/sediment data, fisheries and other  
>target data, and attribution to possible source(s) to determine if a  
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>Also, I don't know if the remediation of some areas has created  
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>a consortium to sort through.

>

>I look forward to your thoughtful input.

>

>Sincerely,

>

>Sabrina Forrest

>Site Assessment Manager

>U.S. Environmental Protection Agency

>1595 Wynkoop Street, Mail Code: 8EPR-B

>Denver, CO 80202-1129

>Direct Ph: 303-312-6484

>Toll Free: 1 800-227-8917, 312-6484

>E-mail: forrest.sabrina@epa.gov

>

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"William Simon"  
<wsimon@frontier.net>  
11/05/2008 06:20 PM

To Sabrina Forrest/EPR/R8/USEPA/US@EPA,  
<pbutler@wildblue.net>, <fearneng@rmi.net>  
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FROM UAA - see year put together

Table 11.1 Metal loads from selected adits in the Upper Animas Basin

			Pounds per day											
			High Flow						Low Flow					
Mine	Phase 1 % Removal	Cost \$ 1000's	Al	Cd	Cu	Fe	Mn	Zn	Al	Cd	Cu	Fe	Mn	Zn
Cement Creek														
Mogul	80%	1000	1	0.04	1.7	14	4	2	1	0.02	0.7	5	1	3
Silver Ledge	50%	300	25	0.09	0.6	222	33	15	4	0.03	0.0	56	11	3
Grand Mogul	0%	60	15	0.15	5.3	33	10	27	1	0.01	0.2	0	0	1
Mammoth	30%	60	1	0.00	0.0	14	2	8	1	0.00	0.0	16	2	0
Anglo-Saxon	30%	60	0	0.00	0.0	15	10	2	0	0.01	0.0	15	5	1
Joe & Johns	30%	300	0	0.00	0.2	1	1	1	0	0.00	0.0	1	0	0
Big Colorado	50%	300	1	0.00	0.0	3	3	0	1	0.00	0.0	6	0	0
Porcupine	30%	60	0	0.00	0.0	14	5	1	0	0.00	0.0	10	5	1
Evelyn	50%	1000	1	0.00	0.0	2	0	0	2	0.00	0.0	3	0	0
Lewis property	50%	60	0	0.01	0.4	2	0	1	0	0.01	0.4	2	0	1
Total Cement Creek			44	0.29	8.3	320	68	57	10	0.07	1.3	113	25	12
Mineral Creek														
Kohler	50%	60	33	0.36	30.7	321	10	91	28	0.25	28.3	264	8	78
5/26/05			3.8	0.0	1.7	29	2.1	9.5						
6/29/05									25.0	.2	11.5	77	30.0	73.6
7/13/05									11.4	.1	4.3	84	11.6	30.6
8/12/05									3.3	.1	1.3	24	2.8	7.8
10/15/05									10.9	.1	3.8	78	5.6	23.0
North Star	50%	300	0	0.02	0.1	6	16	4	1	0.02	0.2	6	11	3
Junction Mine	50%	300	13	0.07	2.2	126	3	14	0	0.00	0.1	3	0	0
Bandora Mine	30%	60	0	0.04	0.1	5	4	10	0	0.02	0.0	2	2	4
Upper Bonner	50%	300	1	0.00	0.0	1	1	1	2	0.01	0.0	2	1	1
Ferrocete Mine	50%	300	2	0.00	0.0	31	5	1	3	0.01	0.0	32	7	1
Paradise	0%	60	28	0.00	0.1	246	20	2	28	0.00	0.1	246	20	2
Brooklyn Mine	30%	300	1	0.01	0.2	8	2	2	1	0.01	0.2	8	2	2
Bonner Mine	50%	300	1	0.01	0.0	1	1	1	2	0.00	0.0	2	1	0
Lower Bonner	30%	300	1	0.00	0.0	1	0	0	2	0.00	0.0	2	1	1
Little Dora	50%	300	1	0.33	0.9	5	653	48	0	0.00	0.0	0	2	0
Total Mineral Creek			81	0.85	34.3	751	715	175	65	0.31	28.9	566	54	93
Animas above Eureka														
Vermillion Mine	50%	300	0	0.04	0.2	2	1	9	0	0.01	0.1	1	0	3
Columbus	50%	300	1	0.01	0.3	3	0	9	0	0.02	0.1	1	0	4
Lower Comet	0%	10	2	0.00	0.1	2	2	1	2	0.00	0.0	1	1	1
N side of Calif. Mtn.	30%	60	4	0.01	0.0	1	5	2	4	0.01	0.0	1	5	2
Sound Democate	50%	60	0	0.00	0.1	0	4	1	0	0.00	0.0	0	2	0
Mountain Queen	50%	300	0	0.00	0.2	1	0	1	0	0.00	0.1	0	0	0
Silver Wing	30%	0	0	0.00	0.1	0	0	0	0	0.00	0.3	1	1	1
Bagley	30%	300	0	0.01	0.0	0	13	7	0	0.01	0.0	0	6	3
Senator	30%	300	0	0.00	0.0	21	7	0	1	0.00	0.0	23	14	2
Total Animas above Eureka			8	0.08	1.0	30	33	29	8	0.06	0.7	29	29	15
Animas below Eureka														
Royal Tiger	50%	300	5	0.04	0.8	0	3	7	0	0.00	0.1	0	0	0
Pride of the West	30%	60	0	0.01	0.0	0	0	3	0	0.01	0.0	0	0	2
Little Nation	30%	300	0	0.00	0.0	9	2	1	0	0.00	0.0	4	1	0
Total Animas below Eureka			6	0.06	0.8	9	5	10	0	0.02	0.1	4	2	3
Grand Total			138	1.29	44.5	1110	822	271	83	0.45	31.0	712	109	124

• No low flow data. Low flow loads are extrapolated from high flow data

\*\* No high flow data. High flow loads are extrapolated from low flow data

GK was permitted to do not pressure as part of UAA 2-10 gpm historically

reduced but still loading in ph 2 of bulkhead may be useful

R & B over 50% AT not signif 30% of UAA table

1996 loads 50% 5/26/05 6/29/05 -> could be high flow 7/13/05 8/12/05 10/15/05

← shift over

Koehler Adit Discharges

DATE	AGENCY	EST_Q_GPM	CFS	PH	TEMP_C	field Cond.	AL_DIS	Al load gm/day	CD_DIS	Cd gm/day	CU_DIS	Cu gm/day
05/15/97	SGC	97	0.216132	2.54	8	740	10500	5555	86	45.5	7910	4184
05/28/98	SGC	124	0.276292	2.17	6	820	10500	7101	20	13.5	6590	4456
5/26/2005	ARSG	49.3	0.109848	5.07	2.8	325	6480	1742	42	11.3	2880	774
06/02/97	SGC	185	0.41221	2.92	8	1030	10700	10795	103	103.9	9630	9716
06/03/99	SGC	122	0.271836	2.28	6	900	13000	8649	0.5	0.3	7540	5017
06/18/98	SGC	112	0.249554	1.18	7	1470	16400	10017	0.5	0.3	15100	9223
6/29/04	ARSG	22.50	0.050134	3.37	4.9	325	92300	11325	745	91.4	42500	5215
07/31/96	SGC	16	0.035651	2.68	8	3700	66100	5768	313	27.3	62400	5445
07/17/97	SGC	49	0.10918	1.84	9	2500	41500	11090	406	108.5	42300	11304
07/17/98	SGC	42	0.093583	1.37	9	2800	40100	9185	460	105.4	36400	8338
07/14/99	SGC	52	0.115865	2.33	7	3100	38500	10918	325	92.2	33200	9415
7/13/2005	ARSG	22.5	0.050134	2.85	5.8	NA	42000	5154	309	37.9	16000	1963
8/9/1995	WQCD	1.35	0.003008	2.13	9.3	3200	58000	427	640	4.7	77000	567
08/12/97	SGC	42	0.093583	1.89	9	2900	44900	10284	157	36.0	54500	12483
08/31/98	SGC	17	0.037879	1.27	11	4200	77100	7148	1240	115.0	63600	5896
8/12/2005	ARSG	5.0	0.011141	3.1 to 3.7		1888	55000	1500	352	9.6	21000	573
09/20/96	SGC	9	0.020053	1.89	11	5400	92500	4540	1320	64.8	105000	5154
10/5/1995	WQCD	7.18	0.016998	2.58	5.2	79.4	95000	3720	970	36.0	140000	8482
10/15/96	SGC	16	0.035651	2.12	8	4300	68700	5995	580	50.6	63000	5497
10/23/97	SGC	40	0.069127	1.78	7	3000	45000	9617	437	96.3	65800	14354
10/19/2005	ARSG	11.3	0.025178	2.54	8.6	error	60000	4930	439	27.1	28000	1726

9/2003 Bulkheaded  
Flow appears stabilized

*decena*



*decrease*

FE_DIS	Fe gm/day	MN_DIS	Mn gm/day	PB_DIS	Pb gm/day	ZN_DIS	Zn gm/day
92600	48986	2980	1576	22	11.6	27900	14759
109000	73711	3230	2184	150	101.4	27700	18732
49000	13174	3480	936	-17.69	-4.8	16000	4302
106000	106946	2340	2361	31	31.3	31500	31781
119000	79176	3510	2335	36	24.0	29700	19761
211000	128880	5300	3237	2.5	1.5	58400	35671
284000	34849	111000	13620	205	25.2	272000	33376
616000	53751	23500	2051	221	19.3	198000	17277
370000	98874	10400	2779	165	44.1	109000	29128
507000	116130	14600	3344	300	68.7	129000	29548
368000	104361	9750	2765	220	62.4	104000	29493
308700	37880	43000	5276	54	6.6	113000	13866
610000	4491	16000	118	230	1.7	190000	1399
420000	96202	11900	2726	208	47.6	120000	27486
687000	63693	22500	2086	395	36.6	185000	17152
391200	10667	46000	1254	25	0.7	130000	3545
927000	45500	27300	1340	150	7.4	263000	12909
990000	38766	26000	1018	290	11.4	320000	12530
707000	61692	20500	1789	190	16.6	204000	17801
448000	97729	11700	2552	52	11.3	134000	29231
575100	35441	41000	2527	25	1.5	169500	10446